

May 25, 2007

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

**Re: *Ex Parte Communication*
Verizon Petition for Forbearance from Dominant Carrier Regulation for In-
Region, Interexchange Services, WC Docket No. 06-56; Special Access Rates
for Price Cap Local Exchange Carriers, WC Docket No. 05-25**

Dear Ms. Dortch:

On Thursday, May 24, 2007, Chris Frentrup, Director, Government Affairs and the undersigned, on behalf of Sprint Nextel Corporation, met with Jay Atkinson, William Dever, Lynne Engledow, William Kehoe and Deena Shetler of the Wireline Competition Bureau. At the meeting, Sprint Nextel continued to express its opposition to the forbearance petition filed by Verizon Communications, Inc. ("Verizon") that is at issue in WC Docket No. 06-56. Specifically, Sprint Nextel emphasized that a grant of the petition needed to be appropriately conditioned to ensure that competition is not harmed by the ability of Verizon to exploit its significant market power in the provision of access services, particularly special access services, to harm its competition in the downstream interexchange and wireless markets. In this regard, Sprint Nextel pointed out that the conditions imposed by the Commission when it granted (in part) Qwest Communication's similar forbearance petition, *Petition of Qwest Communications International Inc. for Forbearance from Enforcement of the Commission's Dominant Carrier Rules As They Apply After Section 272 Sunsets*, FCC 07-13 (released March 9, 2007), while necessary, are not sufficient in the case of Verizon.

Imposing more stringent conditions on Verizon is necessary for two reasons: (1) Verizon has approximately 106 million combined wireless and wireline customer connections, nearly eight times the number of Qwest access lines; and (2) Verizon, unlike Qwest, is an integrated provider of not only local and long distance services but also wireless services. In fact, Verizon is one of the leading wireless providers in the United States. As an integrated provider of all of these services, Verizon has a strong incentive to use its wholesale market power to the detriment of those with whom it competes in the retail market. Thus, if granted, the forbearance must be

Ms. Marlene H. Dortch
May 25, 2007
Page 2

teamed with sufficient conditions to enable competition by preventing Verizon from exercising exclusionary market power. Sprint Nextel suggested that the Commission impose special access price reductions similar to those that the Commission adopted with its grant of AT&T Inc.'s and Bellsouth's transfer of control application, *AT&T Inc. and BellSouth Corporation Application for Transfer of Control*, WC Docket No. 06-74, FCC 06-189 (rel. March 26, 2007). Sprint Nextel also urged that the Commission decide the Special Access Rulemaking in WC Docket No. 05-25 as rapidly as possible.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed electronically in the above-referenced dockets.

Sincerely,

/s/ Anna M. Gomez
Anna M. Gomez

cc: Jay Atkinson
William Dever
Lynne Engledow
William Kehoe
Deena Shetler